

## NOTICE OF INTENT

Department of Environmental Quality  
Office of Environmental Assessment  
Environmental Planning Division

### Radiographer Trainee Requirements (LAC 33:XV.503, 575, 578, 579, and 590) (RP031)

Under the authority of the Environmental Quality Act, R.S. 30:2001 et seq., and in accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the secretary gives notice that rulemaking procedures have been initiated to amend the Radiation Protection regulations, LAC 33:XV.503, 575, 578, 579, and 590 (Log #RP031).

The proposed rule revises requirements for radiographer trainees, removes the term radiographer assistant, and adds a new requirement for reciprocity of radiographers. Persons who currently hold radiographer trainee positions will no longer be required to move up to the next level of licensed radiographer in order to retain their job as a permanent radiographer trainee. Trainees will continue to work under the supervision of a licensed radiographer instructor. By establishing a permanent trainee series for industrial radiographers, industrial radiography companies will be allowed to retain experienced employees at the trainee level who do not desire to move up to the next level of licensed radiographer or who are unable to qualify as a licensed radiographer. The proposed rule recognizes the importance of retaining experienced employees at the trainee level that benefits both the employee and the employer while providing no less protection of public health and the environment. Retaining experienced trainees, rather than continually hiring new trainees, saves in hiring and training costs for the employer and is beneficial to protection of public health and the environment. The basis and rationale for this rule are to establish a permanent trainee level in the industrial radiographer field.

This proposed rule meets an exception listed in R.S. 30:2019.D.(2) and R.S. 49:953.G.(3); therefore, no report regarding environmental/health benefits and social/economic costs is required. This proposed rule has no known impact on family formation, stability, and autonomy as described in R.S. 49:972.

A public hearing will be held on November 25, 2002, at 1:30 p.m. in the Maynard Ketcham Building, Room 326, 7290 Bluebonnet Boulevard, Baton Rouge, LA 70810. Interested persons are invited to attend and submit oral comments on the proposed amendments. Attendees should report directly to the hearing location for DEQ visitor registration, instead of to the security desk in the DEQ Headquarters building. Should individuals with a disability need an accommodation in order to participate, contact Lynn Wilbanks at the address given below or at (225) 765-0399.

All interested persons are invited to submit written comments on the proposed regulations. Persons commenting should reference this proposed regulation by RP031. Such comments must be received no later than December 2, 2002, at 4:30 p.m., and should be sent to Lynn Wilbanks, Regulation Development Section, Box 82178, Baton Rouge, LA 70884-2178 or to FAX (225) 765-0389 or by e-mail to [lynnw@deq.state.la.us](mailto:lynnw@deq.state.la.us). Copies of this proposed regulation can be purchased by contacting the DEQ Records Management Section at (225) 765-0843. Check or money order is required in advance for each copy of RP031.

This proposed regulation is available for inspection at the following DEQ office locations from 8 a.m. until 4:30 p.m.: 7290 Bluebonnet Boulevard, Fourth Floor, Baton Rouge, LA 70810; 1823 Highway 546, West Monroe, LA 71292; State Office Building, 1525 Fairfield Avenue, Shreveport, LA 71101; 3519 Patrick Street, Lake Charles, LA 70605; 201 Evans Road, Building 4, Suite 420, New Orleans, LA 70123; 111 New Center Drive, Lafayette, LA 70508; 104 Lococo Drive, Raceland, LA 70394 or on the Internet at <http://www.deq.state.la.us/planning/regs/index.htm>.

James H. Brent, Ph.D.  
Assistant Secretary

**Title 33**  
**ENVIRONMENTAL QUALITY**  
**Part XV. Radiation Protection**

**Chapter 5. Radiation Safety Requirements for Industrial Radiographic Operations**

**§503. Definitions**

A. As used in this Chapter, the following definitions apply:

\* \* \*

*Radiographer Assistant*—~~repealed~~, any individual who:

a. ~~has five years of documented experience as a radiographer who previously qualified under these regulations prior to January 1, 1995;~~

b. ~~has a documented record of safely performing industrial radiography; and~~

c. ~~has received confirmation from the department that such individual is acceptable to be a radiographer's assistant.~~

*Radiographer Trainee*—any individual who has satisfied the following conditions: of LAC 33:XV.575.B.

a. ~~has been instructed for at least 40 hours in the subjects outlined in Appendix A.I—III of this Chapter;~~

b. ~~has successfully completed a company-specific written examination and field test covering the applicable Louisiana radiation protection regulations (LAC 33:XV) and the company's operating and emergency procedures;~~

c. ~~has completed and documented at least 40 hours of on-the-job training, in industrial radiography operations, as part of a three-person crew composed of an instructor, a radiographer, and the radiographer trainee applicant; and~~

d. ~~has filed a completed Form DRC 20 with the department requesting radiographer trainee status and has received written confirmation from the department granting radiographer trainee status. Radiographer trainee status shall be granted only once for each individual and is valid for only 12 consecutive months. Radiography trainee status may be extended for an additional 12 consecutive months provided that the radiographer trainee has taken the industrial radiography radiation safety examination administered by the department or its agent during the first 12 months of granting radiographer trainee status.~~

\* \* \*

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Nuclear Energy Division, LR 13:569 (October 1987), amended by the Office of Air Quality and Radiation Protection, Radiation Protection Division, LR 20:653 (June 1994), LR 23:1138 (September 1997), amended by the Office of Environmental Assessment, Environmental Planning Division, LR 26:2581 (November 2000), LR 26:2772 (December 2000), LR 27:1231 (August 2001), LR.

## Subchapter B. Personal Radiation Safety Requirements for Radiographers

### §575. Training and Testing

A. No licensee or registrant shall permit any individual to act as a radiographer, as defined in this Chapter, until such individual: completes the following requirements.

1. The individual shall be instructed by a licensed instructor for at least 40 hours in the subjects outlined in ~~I, II, and III,~~ Appendix A of this Chapter; ~~and has demonstrated understanding thereof pursuant to LAC 33:XV.575.A.6. Both the instructor and~~ The course of instruction must be approved by the department prior to the time of instruction; by submitting documentation of instructor licensure and course description.

a. The department must be notified by the licensee at least two weeks prior to presentation of the course.

b. The department must be notified of the cancellation of the course at least 24 hours prior to its scheduled time of presentation.

2. The individual shall ~~has completed~~ on-the-job training supervised by one or more radiographer instructors;.

a. The instructor shall be authorized on the license or certificate of registration ~~certificate;~~

b. The on-the-job training shall include at least:

i. 200 hours of active participation in radioactive materials industrial radiography operations for an individual to perform industrial radiography utilizing radioactive materials; and/or

ii. 120 hours of active participation in x-ray industrial radiography operations for an individual to perform industrial radiography utilizing x-rays;.

c. The hours of on-the-job training do not include safety meetings or classroom training or the use of a cabinet x-ray unit; and

d. The current Form DRC-20, available from the department ~~or the departmental website, www.deq.state.la.us, or the equivalent;~~ must be submitted to the Office of Environmental Services, Permits Division documenting the on-the-job training.

3. The individual shall ~~has received~~ copies of and instruction in the regulations contained in this Chapter and the applicable sections of LAC 33:XV.Chapters 4 and 10, appropriate license(s), and the licensee's or registrant's operating and emergency procedures; ~~and has demonstrated understanding thereof pursuant to LAC 33:XV.575.A.5 and 6;~~

4. The individual shall ~~has demonstrated~~ competence in accordance with Paragraphs pursuant to LAC 33:XV.575.A.5 and 6 of this Section to use the sources of radiation, radiographic exposure devices, related handling tools, and radiation survey instruments ~~which that~~ may be employed in his assignment;.

5. The individual shall ~~has successfully completed~~ a company-specific written examination and field test covering the subjects listed in Paragraphs LAC 33:XV.575.A.3 and 4 of this Section; ~~and~~

6. The individual shall ~~has~~ successfully completed, within the last five years, a radiation safety examination administered by the department ~~or its agent~~, another agreement state, the U.S. Nuclear Regulatory Commission, or the American Society of Non-Destructive Testing (ASNT). The examination must be successfully completed at least once every five years.

7. The individual shall have in his or her possession a valid radiographer I.D. card issued by the department, another agreement state, the U.S. Nuclear Regulatory Commission, or the American Society of Non-Destructive Testing (ASNT).

B. No licensee or registrant shall permit any individual to act as a radiographer trainee, as defined in this Chapter, until such individual completes the following requirements.

1. The requirements of Paragraph A.1 of this Section shall be met.

2. The individual shall complete on-the-job training supervised by one or more radiographer instructors.

a. The instructor shall be authorized on the license or registration certificate.

b. The on-the-job training, as part of a three-person crew composed of an instructor, a radiographer, and the radiographer trainee applicant, shall include at least:

i. 40 hours of active participation in radioactive materials industrial radiography operations for an individual to perform industrial radiography utilizing radioactive materials; and/or

ii. 40 hours of active participation in x-ray industrial radiography operations for an individual to perform industrial radiography utilizing x-rays.

c. The hours of on-the-job training do not include safety meetings or classroom training or the use of a cabinet x-ray unit.

3. The individual shall receive copies of and instruction in the regulations contained in this Chapter and the applicable sections of LAC 33:XV.Chapters 4 and 10, appropriate license, and the licensee's or registrant's operating and emergency procedures.

4. The individual shall demonstrate competence to use the sources of radiation, radiographic exposure devices, related handling tools, and radiation survey instruments that may be employed in his assignment.

5. The individual shall successfully complete a company-specific written examination and field test covering the subjects listed in Paragraphs B.3 and 4 of this Section.

6. The current Form DRC-20, available from the department or the departmental website, [www.deq.state.la.us](http://www.deq.state.la.us), must be submitted to the Office of Environmental Services, Permits Division documenting the on-the-job training, instruction in the subjects outlined in Appendix A in this Chapter, and successful completion of a company-specific written examination.

7. The individual shall have in his or her possession, a valid radiographer trainee I.D. card issued by the department or equivalent certification recognized by another agreement state or the U.S. Nuclear Regulatory Commission.

8. Each radiographer trainee I.D. card is valid for a five-year period, unless revoked or suspended in accordance with LAC 33:XV.579.

BC. Each licensee or registrant shall maintain, for inspection by the department, until disposition is authorized by the department, the following records for each radiographer and radiographer trainee:

1. Records of Training and Certification. The records must include radiographer certification documents and verification of certification status, copies of written tests, dates and results of oral tests and field examinations, and the names of individuals conducting and receiving the oral and field examinations; ~~and~~.

2. Records of Annual Refresher Ssafety Training and ~~semiannual~~ Quarterly Inspections of Job Performance. The records must list the topics discussed during the refresher safety training, the dates the annual refresher safety training was conducted, and names of the instructors and attendees. For inspections of job performance, the records must also include a list showing the items checked and any noncompliance observed by the radiation safety officer or designee.

ED. Each licensee or registrant shall conduct a program of internal audits to ensure that the Radiation Protection Regulations (LAC 33:XV), Louisiana radioactive material license conditions, and the licensee's or registrant's operating and emergency procedures are followed by each radiographer and radiographer trainee. ~~These internal audits shall be performed at least quarterly, and each radiographer shall be audited at least quarterly.~~ Each radiographer and radiographer trainee shall be audited at quarterly intervals. Records of internal audits shall be maintained for review by the department for two consecutive years from the date of the audit.

DE. The licensee or registrant shall provide annual refresher safety training to all radiographers, ~~radiographer assistants,~~ and radiographer trainees at intervals not to exceed 12 months.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Nuclear Energy Division, LR 13:569 (October 1987), amended by the Office of Air Quality and Radiation Protection, Radiation Protection Division, LR 20:653 (June 1994), LR 20:999 (September 1994), LR 23:1138 (September 1997), amended by the Office of Environmental Assessment, Environmental Planning Division, LR 26:2583 (November 2000), LR 27:1235 (August 2001), LR 28:1951 (September 2002), LR.

## **§578. Reciprocity**

A. – A.1. ...

2. the requirements and procedures for certification in the state of jurisdiction issuing the certification afford the same or comparable certification standards as those afforded by LAC 33:XV.575; ~~and~~

3. the applicant presents the certification to the Office of Environmental Services, Permits Division prior to entry into Louisiana; ~~and~~

4. no escalated enforcement action is pending with the Nuclear Regulatory Commission or in any other state.

B. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of Air Quality and Radiation Protection, Radiation Protection Division, LR 20:1000 (September 1994), amended by the Office of Environmental Assessment, Environmental Planning Division, LR 26:2583 (November 2000), LR.

**§579. Identification (I.D.) Cards for Radiographers or Radiographer Trainees**

**A. ~~Issuance of I.D. Card~~**

1. An I.D. card shall be issued to each person who successfully completes the requirements of LAC 33:XV.575.A or B.
2. ~~Each person's~~ A radiographer I.D. card shall contain ~~his/her~~ the radiographer's photograph. The department will take the photograph at the time the examination is administered. The radiographer trainee I.D. card does not require a photograph.
3. ~~The~~ An I.D. card remains the property of the state of Louisiana and may be revoked or suspended under the provisions of ~~LAC 33:XV.579~~ this Section.

**A.4. – B. ...**

**C. Renewal of a Radiographer I.D. Card**

1. Applications for examination to renew an I.D. card shall be filed in accordance with LAC 33:XV.575.A.
2. The examination for renewal of an I.D. card shall be administered in accordance with LAC 33:XV.575.
3. A renewal I.D. card shall be issued in accordance with ~~LAC 33:XV.579~~ this Section.

**D. Renewal of a Radiographer Trainee I.D. Card**

1. Applications for a renewal radiographer trainee I.D. card shall be filed in accordance with LAC 33:XV.575.B.
2. A renewal I.D. card shall be issued in accordance with this Section.

**~~D.E.~~ Revocation or Suspension of an I.D. Card**

1. Any radiographer or radiographer trainee who violates these rules may be required to show cause at a formal hearing why ~~his/~~ or her I.D. card should not be revoked or suspended in accordance with these ~~rules~~ regulations.
2. When a department order has been issued for an industrial radiographer or radiographer trainee to cease and desist from the use of sources of radiation or the department revokes or suspends ~~his/~~ or her I.D. card, the industrial radiographer or radiographer trainee shall surrender the I.D. card to the department until the order is changed or the suspension expires.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of Air Quality and Radiation Protection, Radiation Protection Division, LR 20:1000 (September 1994), amended by the Office of Environmental Assessment, Environmental Planning Division, LR 26:2584 (November 2000), LR .

### Subchapter C. Precautionary Procedures in Radiographic Operations

#### §590. Specific Requirements for Radiographic Personnel Performing Industrial Radiography

A. – C. ...

D. No individual other than a radiographer, ~~a radiographer assistant~~, or a radiographer trainee who is under the personal supervision of a radiographer instructor shall manipulate controls or operate equipment used in industrial radiographic operations. The ~~radiographer's assistant~~ or radiographer trainee shall also be under the personal supervision of a radiographer instructor when using radiographic exposure devices, associated equipment, or a sealed source or while conducting radiation surveys required by LAC 33:XV.587 to determine that the sealed source has returned to its shielded position or the radiation machine is off after an exposure. The personal supervision must include:

1. the radiographer's instructor's physical presence at the site where the sources of radiation are being used;
2. the availability of the radiographer instructor to give immediate assistance if required; and
3. the radiographer's instructor's direct observation of the ~~assistant's~~ or trainee's performance of the operations referred to in this Section.

E. ...

1. has met the requirements of LAC 33:XV.575.~~BA~~;

E.2. – F. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of Air Quality and Radiation Protection, Radiation Protection Division, LR 20:653 (June 1994), amended LR 23:1139 (September 1997), amended by the Office of Environmental Assessment, Environmental Planning Division, LR 26:2584 (November 2000), LR 27:1237 (August 2001), LR 28:1952 (September 2002), LR.



**FISCAL AND ECONOMIC IMPACT STATEMENT  
FOR ADMINISTRATIVE RULES**LOG #: RP031

Person

Preparing

Statement: Michael HenryDept.: Environmental QualityPhone: 765-0892Office: Environmental Assessment

Return

Address: P. O. Box 82178 , Baton Rouge, La

Rule

Title: Radiographer Trainee Requirements  
(LAC 33:V, 503, 575, 578, 579, and 590)

Date Rule

Takes Effect: Upon Promulgation**SUMMARY**

(Use complete sentences)

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND WILL BE PUBLISHED IN THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.

**I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS (Summary)**

There will be no implementation costs to state or local governmental units.

**II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)**

There will be no effect on revenue collections of state or local governmental units.

**III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS (Summary)**

Radiographer trainees will be positively impacted since they will no longer be required to become licensed radiographers within a specified period of time in order to retain their jobs as radiographer trainees. Industrial radiography companies will also be impacted since establishing a permanent trainee series for industrial radiographers will allow them to retain experienced employees at the apprentice level who do not desire to move up to the next level of licensed radiographer or who are unable to qualify as a licensed radiographer. The estimated cost to industrial radiography companies to replace and train an employee as a radiographer trainee is estimated to be approximately \$1600. The proposed regulation also requires that radiographer trainees who lose their department-issued card pay a small fee for a replacement card.

**IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)**

All companies and persons in the industry will be equally impacted. Persons who currently hold radiographer trainee positions will no longer be required to move up to the next level of licensed

radiographer in order to retain their job as a radiographer trainee. Trainees will continue to work under the supervision of a licensed radiographer instructor.

\_\_\_\_\_  
Signature of Agency Head or Designee

\_\_\_\_\_  
LEGISLATIVE FISCAL OFFICER OR  
DESIGNEE

James H. Brent, Ph.D Assistant Secretary  
Typed Name and Title of Agency Head or Designee

\_\_\_\_\_  
Date of Signature  
LFO 7/1/94

\_\_\_\_\_  
Date of Signature

**FISCAL AND ECONOMIC IMPACT STATEMENT  
FOR ADMINISTRATIVE RULES**

The following information is requested in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

- A. Provide a brief summary of the content of the rule (if proposed for adoption or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

The proposed rule revises requirements for radiographer trainees, removes the term radiographer assistant, and adds a new requirement for reciprocity of radiographers. Persons who currently hold radiographer trainee positions will no longer be required to move up to the next level of licensed radiographer in order to retain their job as a permanent radiographer trainee. Trainees will continue to work under the supervision of a licensed radiographer instructor.

By establishing a permanent trainee series for industrial radiographers, industrial radiography companies will be allowed to retain experienced employees at the trainee level who do not desire to move up to the next level of licensed radiographer or who are unable to qualify as a licensed radiographer.

- B. Summarize the circumstances that require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

The proposed rule recognizes the importance of retaining experienced employees at the trainee level that benefits both the employee and the employer while providing no less protection of public health and the environment. Retaining experienced trainees saves in hiring and training costs for the employer. It also recognizes that keeping experienced employees at a trainee level is beneficial to protection of public health and the environment rather than continually hiring new trainees.

- C. Compliance with Act II of the 1986 First Extraordinary Session

(1) Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

No increase in the expenditure of funds is expected.

2) If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?

(a) \_\_\_\_ Yes. If yes, attach documentation.

(b) \_\_\_\_ No. If no, provide justification as to why this rule change should be published at this time.

This is not applicable

**FISCAL AND ECONOMIC IMPACT STATEMENT****WORKSHEET****I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED**

1. What is the anticipated increase (decrease) in costs to implement the proposed action?  
There is no anticipated increase or decrease in costs for implementation of this action.

<u>COSTS</u>	<u>FY 02-03</u>	<u>FY 03-04</u>	<u>FY 04-05</u>
PERSONAL SERVICES			
OPERATING EXPENSES			
PROFESSIONAL SERVICES			
OTHER CHARGES			
EQUIPMENT			
<b>TOTAL</b>	<b>-0-</b>	<b>-0-</b>	<b>-0-</b>
MAJOR REPAIR & CONSTR.			
POSITIONS (#)			

2. Provide a narrative explanation of the costs or savings shown in "A.1." including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

Existing staff will administer this rule.

3. Sources of funding for implementing the proposed rule or rule change.

<u>SOURCE</u>	<u>FY 02-03</u>	<u>FY 03-04</u>	<u>FY 04-05</u>
STATE GENERAL FUND			
AGENCY SELF-GENERATED			
DEDICATED			
FEDERAL FUNDS			
OTHER (Specify)			
<b>TOTAL</b>	<b>-0-</b>	<b>-0-</b>	<b>-0-</b>

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

The Agency is currently administering the program for trainees.

**B. COST OR SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION PROPOSED.**

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and methods used in calculating this impact.

There will be no cost or savings to local governmental units resulting from the action proposed.

2. Indicate the sources of funding of the local governmental unit which will be affected by these costs or savings.

This indicator is not applicable.

**FISCAL AND ECONOMIC IMPACT STATEMENT****WORKSHEET****II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS**

- A. What increase (decrease) in revenues can be anticipated from the proposed action?  
There will be no increase or decrease in revenues from the proposed action.

REVENUE INCREASE/DECREASE	FY 02-03	FY 03-04	FY 04-05
STATE GENERAL FUND			
AGENCY SELF-GENERATED			
RESTRICTED FUNDS*			
FEDERAL FUNDS			
LOCAL FUNDS			
TOTAL	-0-	-0-	-0-

\*Specify the particular fund being impacted.

- B. Provide a narrative explanation of each increase or decrease in revenues shown in "A." Describe all data, assumptions, and methods used in calculating these increases or decreases.

This indicator is not applicable.

**III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NONGOVERNMENTAL GROUPS**

- A. What persons or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

Radiographer trainees will be positively impacted since they will no longer be required to become licensed radiographers within a specified period of time in order to retain their jobs as permanent radiographer trainees. Industrial radiography companies will also be impacted since establishing a permanent trainee series for industrial radiographers will allow them to retain experienced employees at the apprentice level who do not desire to move up to the next level of licensed radiographer or who are unable to qualify as a licensed radiographer. The estimated cost to industrial radiography companies to replace and train an employee as a radiographer trainee is estimated to be approximately \$1600. The proposed regulation also requires that radiographer trainees who lose their department-issued card pay a small fee for a replacement card.

- B. Also provide an estimate and a narrative description of any impact on receipts and/or income resulting from this rule or rule change to these groups.

Establishing a permanent trainee series for industrial radiography will save companies the training cost for those employees who do not qualify for an industrial radiographer. The estimated cost of replacing and training an employee in this field is about \$1600.

**IV. EFFECTS ON COMPETITION AND EMPLOYMENT**

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

All companies and persons in the industry will be equally impacted. Persons who currently hold radiographer trainee positions will no longer be required to move up to the next level of licensed radiographer in order to retain their job as a permanent radiographer trainee. Trainees will continue to work under the supervision of a licensed radiographer instructor.